UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I - EPA New England

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Final Revision 1: 12-14-12

SUBJECT: CWA Compliance Evaluation of Dragon Products in Thomaston, Maine

FROM: Alex Rosenberg, Water Technical Unit

THRU: Denny Dart, Enforcement Coordinator, Water Technical Unit

TO: File

I. Facility Information

A. Facility Name:	Dragon Products Company, LLC
B. Facility Location:	U.S. Route 1, 107 New County Road, Thomaston, Maine
C. Facility Mailing Address:	PO Box 191, Thomaston, Maine 04861-0191
D. Facility Contact:	Michael Martunas, Environmental Manager (207) 593-0147 or 207-593-0100 x 147 mmartunas@dragonproducts.com
E. Corporate Address:	320-D Midland Parkway Summerville, SC 29485
F. Type of Source:	Stormwater, Process Water
G: Date MSGP permit issued:	April 26, 2011
H: Permit #:	MER05B289

II Background Information

A. Date of inspection:	March 21, 2012 ('Inspection 1') & May 30, 2012 ('Inspection 2')
B. Weather Conditions:	clear, 70's
C. US EPA Representative(s):	Alex Rosenberg and Joseph Canzano
D. State Representative(s):	None

E. Federally Enforceable Requirements Covered During the Inspection:
   1) General Permit – Maine Pollutant Discharge Elimination System, Stormwater Discharge Associated with Industrial Activity – Sector E: Cement and Concrete; Permit #MER05B289
      a. Issued 10/11/2005 – replaced EPA's MSGP from 10/30/00
      b. Issued 4/26/2011
   2) 40 CFR Part 311, SPCC regulations
   3) Maine Department of Environmental Protection (DEP) Water Pollution Control Regulation Chapters
      a. Surface Waters Toxic Control Program 06-096 530(1)(b)
      b. 38 M.R.S.A. § 413.1: No person may directly or indirectly discharge or cause to be discharged any pollutant without first obtaining a license therefore from the department.
      c. Chapter 584 Surface Water Quality Criteria for toxic Pollutants – Class B Receiving Water : ambient criteria narrative limits, 'human health criteria are intended to assure that toxic pollutants are not present in concentrations or amounts that would cause adverse impact to persons who eat organisms or drink water taken from the surface waters.'

F. Enforcement Actions since 2007:
   1) DEP Notice of Violation (NOV) **December 16, 2008**: (MEDEP Bureau of Land and Water – J. Glowa) docket no. MER200808
      a. discharging non-contact cooling water from Quarry #1 without obtaining a license
   2) DEP Notice of Violation (NOV) **March 20, 2009** (MEDEP Bureau of Land and Water – L. Lohn) docket # MER200901
      a. On March 2, 2009 approximately 3,325 gallons of leachate was discharged from the leachate collection basins to Quarry #1;
      On March 12, 2009 an unknown quantity of leachate was discharged to wetlands that drain to Outfall #3;
   3) DEP Notice of Violation (NOV) **May 27, 2009** (MEDEP Bureau of Solid Waste - A. Dumont) docket #03-30-2009-001
      a. Permanently cease unlicensed discharges from waste clinker leachate collection pond to waters of the state;
      b. References Mar 2 and March 12, 2009 'unanticipated bypasses'

III Purpose of Inspection

To determine compliance with the above referenced regulations and to investigate process water discharges from Quarry #1.

IV Inspection Logisitics

A. Entry

Alex Rosenberg and Joseph Canzano entered the site at 9:00 AM on March 3, 2012 for the first inspection ('Inspection 1'). They were met by the Environmental Manager Michael Martunas. In the meeting room they were joined by the Plant Manager Ray DeGrass.

Alex Rosenberg then returned to the site on May 30, 2012 to conduct a follow-up inspection ('Inspection 2'). Michael Martunas met Alex in the office building.

B. Opening Conference

At the March 3, 2012 inspection, Joseph Canzano explained the purpose of the inspection. A schedule for the day was agreed upon that included a records review and discussion about the facility history and a site walkthrough after lunch. Both Joseph Canzano and Alex Rosenberg showed their inspector credentials to Michael Martunas and Ray DeGrass.

For Inspection 2, Alex Rosenberg explained that some further information was going to be obtained regarding the flow path from the truck washing area and the culvert under Rt 1. Alex Rosenberg then showed Mr. Martunas his inspection credentials, and they began the site walkthrough of the two mentioned areas.

C. Site Walkthrough

During Inspection 1 Alex Rosenberg and Joseph Canzano joined Michael Martunas in a company pick-up truck to tour the facility. The group stopped at the following locations in this order before returning to the office for the Closing interview:

1) Sulphuric acid dispenser building;
2) Outfall #103;
3) Outfall #101; (did not stop car or take pictures)
4) Catchment area for Outfall #101;
5) Discharge Culvert for Outfall #101;
6) Outfall #104;
7) Outfall #102;
8) Waste Clinker Dump Pile;
9) Pre-treatment Pump house;
10) Quarry #1;
11) Garage;
12) Truck-washing area; and

13)Man-Made Settling Pond.

During Inspection 2, Michael Martunas drove and walked with Alex Rosenberg the path from the truck wash area to the man-made settling pond, and then from the south side of the Rt 1 culvert into the Dragon property along the discharges flowpath approximately 200 meters.

D. Closing Conference

During Inspection 1 Alex Rosenberg and Joseph Canzano described their findings to both Michael Martunas and Ray DeGrass at a closing conference. Both EPA inspectors left the site at approximately 15:30PM.

During Inspection 2 Alex Rosenberg gave Michael Martunas a brief explanation that the pictures taken during the inspection would be used for further review and that the facility could expect to be sent an inspection letter/report in the future.

V Facility Description

Information in this section was obtained from a previous state file review conducted by Alex Rosenberg at the Maine Department of Environmental Protection office in Augusta and from facility personnel during the inspections.

A. Company / Facility History

Dragon Products is privately owned by Giant Cement Company ("GCC") which in turn is owned by two parent companies Giant Cement Holding, Inc., headquartered in South Carolina and from Spain, Cementos Portland Valerrivas, S.A. ("CPV") out of Madrid. Dragon has several other sites throughout Maine and New England. According to Michael Martunas, the Environmental Manager at Dragon Products facility in Thomaston Maine (here after referred to as "Facility"), Dragon runs 9 concrete batch plants in Maine.

Ray DeGrass and Michael Martunas stated the following details about Dragon operations:

- cement from the Facility is transported via railcar to a port facility owned and operated by Dragon in Rockland, ME;
- Dragon operates two shipping terminals, one in Newington, NH and the other in Boston, MA;
- the Boston terminal is located at 36 Dry Dock Avenue and operates under the name 'Coastal Cement' and employs Dragon personnel to run 4 cement silos. The land in Boston is leased from the company EDIC; and
- Dragon is a tenant at their New Hampshire terminal in Newington, and not only leases the land, but also contracts the operations.

According to Ray DeGrass with the Thomaston facility's current permitted mine footprint, mine life expectancy is 30+ years. With expansion on the facility's property, but having to obtain new permits, there is a mine life expectancy of approximately 50+ years according to Ray DeGrass.

In the remainder of this report "Dragon or Facility" refers only to the Route 1 Thomaston, Maine site.

B. Management Structure

The management structure of Dragon was explained to the inspectors by Ray DeGrass to be the following: Dragon's corporate office is located in Summerville, South Carolina. Dragon operates an administrative office in Portland, ME. In addition to administrative personnel the Portland office also serves as the main office for the Concrete Division, where David Grinnell is the Vice President of Concrete. The Environmental Management of all of Dragon facilities is overseen by Dragon's Vice President of Environmental Affairs, Stephen P. Holt, P.E. who works out of the GCC headquarters in Summerville, SC. Michael Martunas is responsible for environmental compliance and response at all Dragon facilities in New England including their terminals, concrete batch plants and the Facility in Thomaston, ME, a cement production site and active mine. Michael reports to Steven Holt, P.E. on environmental compliance.

C. Number of Employees and Working Hours

According to an EPA Air inspection report, company-wide, Dragon has about 200 employees. According to Ray DeGrass, plant manager, approximately 100 individuals are employed at the Thomaston site. Ray DeGrass explained that the Facility operates 24 hours/day, 7 days/week and in the past few years there have been extended periods (a few months, usually in the winter) when the kiln shuts down due to low demand for cement.

D. Facility Water Management and Operations Description

Dragon produces portland and masonry cement. The cement production facility is on the south side of Route 1. According to past EPA inspection reports, in 2004, Dragon literally cut its kiln in half and began producing cement using a dry-kiln process. According to Ray DeGrass the totally capacity of the Facility is approximately 700 thousand tons per year. Currently Dragon is producing under half of the Facility's maximum output capacity.

Dragon blasts limestone out of a quarry on the north side of Route 1 (referred to as "**The Quarry**" also referenced as the "**Pit**" or "Main Quarry" on some EPA inspection photo logs). According to Ray DeGrass, blasting is scheduled on an as needed basis based on production needs and geologic constraints. In 2011 Dragon hired a contractor to conduct the blasting in order to improve safety and decrease the cost and number of shots required. While the Kiln is

operational the Facility, pre-2011, averaged 2 shots per week, and now is down to approximately 1 shot per week.

Drainage in the Quarry, according to Michael Martunas, is accomplished at the Quarry's lowest elevation. Currently the lowest elevation is approximately 180 feet below sea level. This lowest elevation is termed the *sinking cut*, as a sinking type blast is used in this area of the quarry. The sinking cut provides a drainage area where surface water and shallow groundwater drainage can collect without affecting quarry operations.

A fleet of haul trucks transports the mined limestone through a tunnel under Route 1 (constructed in 1957 by a prior owner of the facility) to a smaller quarry area referred to as **Quarry #1**. Quarrying of limestone has been going on at this site since at least the 1920's.

According to Ray DeGrass and Michael Martunas, stormwater from Quarry #1, a historic quarry on the south side of Rt. 1, is used as Non-Contact Cooling Water ("NCCW") in the process systems at the cement plant. NCCW pumped from Quarry #1 is recycled back to Quarry #1. During periods of heavy precipitation the quarry is dewatered by pumping to a **Man-Made Settling Pond** ('MMSP') that discharges to stormwater **Outfall #104**. This recycling loop results in the NCCW being periodically discharged through the MMSP to Outfall #104.

According to Michael Martunas traffic enters the Quarry (or Pit) along Dexter Street off of Rt 1. Between Dexter Street and the Main Quarry there is a catchment area that is approximately between 500 and 20,000 square feet termed **Zone A Southeast (SE) Pit** ("Zone A"). This area was observed by Alex Rosenberg and Joseph Canzano to be bordered by a rock crushing operation run by an external outfit, Ferraiolo – who according to Michael Martunas leases the rights to operate from Dragon, the wall of the Main Quarry, the access road from Dexter Street and Rt. 1 itself. Zone A includes a high traffic corridor according to Michael Martunas, and was observed by all inspectors to consist of an unpaved roadway and piles of undisturbed waste rock, aggregate and crushed rock.

Zone A drains to the south through a culvert in the man-made berm to the north of Rt 1. Drainage then crosses under Rt. 1 through a second culvert. After the second culvert, drainage flows over-land into a small old quarry pond. This flow is what according to Michael Martunas and Facility stormwater documentation flowed to Outfall #101, located at the property boundary along Buttermilk lane. Outfall #101 had been monitored in the past, but is no longer being monitored. Currently water collects in the road-side ditch beside Buttermilk lane before draining through a culvert beneath Buttermilk Lane to the east, and off-site.

According to Ray DeGrass, the Facility is currently using old stockpiled material from their **Waste Clinker Pile ("WCP")** at the east end of their facility to supplement feed material. Raw limestone is mixed with the other solid kiln feed materials.

Lined drains surrounding the WCP collect leachate migrating from the WCP. This leachate is collected and pumped into a lined detention basin at its toe. A **Clinker Dump Pump-House** is located next to this pond. The pump house is capable of either pumping WCP leachate through the **Quarry #5** pump house to a series of Gas Conditioning Tower **("GCT") Water Collection Basins** used for cooling water, or it can receive water back from the GCT basins.

The GCT Water Collection Basins were designed to be a closed loop system. According to Michael Martunas wastewater currently has the ability to be pumped out of the basins and through a pre-treatment process before discharging to the Town WWTP. According to Michael Martunas, in 2009 a discharge of approximately 3000 gallons of leachate from the GCT basins was caused by an improperly calculated site-wide water balance that did not accurately establish sufficient capacity for a large precipitation event. The discharge entered Quarry #1.

Dragon conducts pre-treatment of the portion of GCT cooling and WCP leachate mixture that is not needed for cooling water by adding sulphuric acid to adjust pH, and pump it to the Town of Thomaston's WWTP. According to Ray DeGrass and Michael Martunas approximately 100 Gallons Per Minute (GPM) is discharged to the WWTP 24 hours per day 7 days per week when the system is active.

Stormwater from the WCP area that either escapes catchment or falls outside of the toe drain catchment area eventually discharges at stormwater Outfall #103 approximately 0.5 miles to the east of the WCP at the property boundary – a culvert on Buttermilk Lane, just north of Bulter Road (formerly Marsh Rd).

A set of railroad tracks crosses Butler Road and Buttermilk Lane just south of Outfall #103 and was observed by all inspectors. An area south of the Railroad tracks drains through a culvert to the north and approximately 50 yards west of Buttermilk Lane and eventually mixes with WCP stormwater and flows through Stormwater Outfall #103. According to Michael Martunas the area between the WCP pile and Outfall #103 is wooded and or wetlands and was not walked.

A wet well located at the Quarry #5 pump station is used to collect WCP leachate before it is pumped to the GCT basins. The WCP leachate is combined with **Cement Kiln Dust ("CKD")** pile leachate before finally being discharged to the GCT basins. The CKD pile is a historic pile of precalcined clinker material collected in the kiln's air pollution control device (bag house). The CKD pile was created in the early 1970's and no new material has been added since 1997.

Historic groundwater and surface water quality monitoring results associated with the CKD pile runoff (including results from stormwater outfall #102) resulted in MEDEP Solid Waste Board Orders #S-020777-WO-B-N and #S-202778-WO-C-N, issued in June 2007, which required the Facility to install a leachate management and collection system and cover the pile with a 12-inch impermeable clay cap and to increase monitoring locations and measured parameters.

The cover and collection system was completed late in 2009 according to Ray DeGrass and Michael Martunas and groundwater and surface water monitoring is still being conducted under order by the MEDEP Solid Waste Department. According to Michael Martunas and Ray DeGrass 100% of CKD shallow groundwater leachate, approximately 20,000 to 30,000 Gallons Per Day (GPD), is now captured and pumped to the GCT basins.

Storm drains are located throughout the Facility. No drains exist in any of the operational buildings. The storm drains flow either to the Man-Made Settling Pond and then to Outfall #104 or to Quarry #1. According to Michael Martunas, northern catchbasins flow to Quarry #1 and southern basins to the Man-Made Settling Pond. During periods of Quarry #1 dewatering, water is pumped to the Man-Made Settling Pond and then flows by gravity to Outfall #104.

Truck Washing is designated to be conducted at a specific location ascribed in the Stormwater Pollution Protection Plan ("SWPPP"). The automatic truck sprayer was temporarily out of service during Inspection 1, but was operational during Inspection 2. Wash water drains to a bermed area just south of the Facility. Water in the bermed containment area then drains through a culvert in the berm and continues to flow in an open channel adjacent to the southern perimeter of the property.

The truck washing flow discharged out of the bermed containment area is joined by stormwater discharge from the southern section of the Facility. These flows comingle with water from the wetlands that are to the south of the Facility and material laydown area. Flows eventually end up pooling in an area to the east of the private railroad spur built by the Facility to load product from the Facility. A culvert underneath the railroad tracks continues to lead the flows towards the man-made settling pond past Quarry #5. At the railroad tracks another source of stormwater joins the flowpath.

Before entering the Man-Made Settling Pond through a final culvert, truck wash water and stormwater flows mix with one last source of water, discharge from Quarry #5. During certain hydraulic conditions flows passing Quarry #5 either enter Quarry #5 temporarily before being discharged back to their original drainage channel along it's northwestern perimeter. According to Michael Martunas, under normal conditions Quarry #5 the hydraulic gradient in the area causes flow to exit Quarry #5 and into the Man-Made Settling Pond. The ultimate destination of any flow scenario is that all truck-wash water and stormwater reaches the Man-Made Settling Pond which discharges to Outfall #104.

VI. Records Review

1) Stormwater Pollution Prevention Plan ("SWPPP"):

- The SWPPP that was reviewed was dated May 2011 and was written for the MEDEP

MSGP for Stormwater Permit # MER05B209.

- The plan stated that the Facility is a licensed processor of oil contaminated soils.
- The plan states that there is a Contingency Plan for failure of Waste Clinker Dump Pile leachate pond, but there was none drafted.
- Street sweeping is required in the plan to be conducted at a minimum of 30hrs/week. Michael Martunas says that the log is kept electronically.
- There is no record of completed structural or non-structural BMP maintenance activities.
- Outfall #101 was last inspected on 07/24/08. Michael Martunas stated that after a construction project on Buttermilk Lane in 2008, the MEDEP allowed monitoring at the #101 location to cease.
- Plan describes that truck washing process water discharges at stormwater Outfall #104.
- Water quality concentrations exceeded at monitoring point S3 (currently reported as stormwater Outfall #102) during quarterly inspections before 2008. According to Michael Martunas, a spill of leachate from collection basins in 2008 initiated a requirement by MEDEP for continuous monitoring of pH at Outfall #102.
- Permit Non-Compliance Issue recorded on 10/28/08 as pumping of 'Q1' (most likely Quarry #1) to Man-Made Settling Pond. A separate page titled 'Table 5' where this non-compliance issue was noted, has the signature of Michael Martunas – see Attachment 2.
- Plan also includes studies about the presence of rare and exemplary botanical features (none found), wildlife essential habitats (none found) in proximity to the site. These studies did not include a site-visit from either investigating party and conclude with statements that their database may not be complete - see Attachment 2.

VII. Site Walkthrough Observations: (see attached photos)

1) Sulphuric acid dispenser building;

The facility has a total capacity of 5,100 gallons of sulphuric acid. There are two tanks which are in parallel and pump down gradient to the Pre-treatment Pump House. *For more information see the SPCC/Pre-treatment report from the same day, written by Joseph Canzano.*

2) Outfall #103;

Flow was co-mingling with surface runoff from off the Facility property. Monitoring location was placed after a wide wetland/marsh area at the west side of Buttermilk lane.

3) Outfall #101; (did not stop car or take pictures)

This Outfall is located just north and across the street from the Town of Thomaston's waste transfer station and a material stockpile and laydown area for a private business person, Approximately 150-200 yards south of the junction of Buttermilk lane and Rt 1.

4) Catchment area for Outfall #101;

Not defined after July of 2008, and therefore no stop was made on the site walkthrough.

5) Discharge Culvert for Outfall #101;

On the northern berm of Rt 1 an approximately 6 ft diameter aggregate rock outcrop was created around a discharge pipe that drains the Zone A SE Quarry area. The discharged waters daylight for approximately 1 foot before entering a culvert that runs underneath Rt. 1. On the south side of Rt. 1 the discharge enters a historic quarry pond, approximately 50 yards from the road. Discharge from the quarry flows along a continuous path, to outfall #101. According to Facility representatives and topographical and aerial maps, discharge from this outfall flows southeast and discharges to Marsh Brook and then into the Weskeag River.

6) Outfall #104;

Located just before a culvert running from the Facility's property underneath Rt 131. The Man-Made Settling Pond that is used as the BMP for stormwater, truck wash water and NCCW discharging to this monitoring location is located approximately 0.5 miles east. Between the Settling Pond and Outfall #104 effluent meanders through wetlands covered in reeds and marshy forested areas. Approximately 100 yards from the outfall location, water is directed through a culvert underneath the railroad tracks (see page 2 of Attachment 1 – Photos). From the outfall location, it is approximately another quarter mile to the St. George River along a continuous flow path.

7) Former Outfall #102 (currently S3);

This location is approximately one quarter mile west-northwest of the facility operations. Leachate from the CKD Pile historically impacted stormwater in this location according to Michael Martunas. The sample location has unsteady footing down a straw lined embankment. PVC pipes were observed to be buried in the flow path, according to Michael Martunas in-order to be used as dedicated housings for continuous water quality monitoring in 2008-2009. Water

from this outfall discharges through a culvert underneath Rt. 1 and into the Mill River a few hundred yards to the northwest. Runoff from Rt. 1 also collects at this monitoring location (see Attachment 1 - Photos).

8) Waste Clinker Storage Pile;

A geotextile lined drainage ditch along the western side of the storage pile was observed by all inspectors. This ditch was observed to pass underneath the pre-treatment pump house and into a detention pond at the toe of the pile. The color of the water was aqua-marine. White precipitate was also observed by the inspectors at the high water mark along the geotextile in the ditch and within the detention pond.

9) Pre-treatment Pump house;

See photos.

10) Quarry #1;

Water flowing out of the through-pass tunnel between the active Quarry (Pit) and Quarry #1 was in an unlined open ditch. Water was slow moving and contained visible sediments.

A shipping crate was present that housed new drums of vehicle oil. A five truck fleet of 50 ton haul trucks and a mobile refueler were parked next to the drainage ditch.

11) Garage;

One 275 Gallon AST was observed outside of the garage with no containment. The AST was empty and had been recently removed from a mobile vehicle.

A daily Best Management Practice ("BMP") described in the SWPPP is daily street sweeping. The street sweeper was observed parked in front of one the maintenance garage bays. The operating mechanics stated that it had been out-of-service since 3/20/12 and the Facility is awaiting parts delivery (expected for 3/23/12) to fix the machine. Michael Martunas attested to that statement. No mention of this structural BMP control malfunction was recorded in the Facility SWPPP. Both Michael Martunas and Ray DeGrass described that all street sweeping operations and maintenance records are kept in a separate log.

12) Truck-washing area and parking lots;

During Inspection 1 three catch-basins were observed during the inspection. One was located approximately 40 feet north-northwest of the Facilities largest Above Ground Storage Tank, and outside of the single door garage bay entrance. The others were located in a linear orientation in

the parking lot along the south side of the Plant.

The truck-washing area is located to the southeast of the process buildings and garage. An outside U-shaped water sprayer cleans trucks as they drive through it. According to Michael Martunas, it is company policy that all truck must be washed before they leave the site and drive on the road.

Wash water discharges to the south into a bermed basin. At the edge of the truck-washing area the facility at least seasonally replaces a berm (approximately 1 ft high) of gravel to filter the truck wash discharge before it discharged into the bermed basin located approximately 20 feet to the south. From the southern berm of the basin to the waters surface is a drop in elevation of approximately 10 feet. According to Michael Martunas the basin has never been dredged or cleaned out. There is evidence of sediment build-up at the bottom of the basin. The water in the basin has many plants growing in it such as reeds, etc.

At the western tip of the bermed basin water discharges through a culvert where it co-mingles with discharge from another culvert that carries stormwater from the southern section of the Facility. These waters then pass through another culvert as they continue to flow along the southern edge of the Pack and Ship Dept. parking area (southwestern section of the plant). The flow path was observed by Alex Rosenberg during inspection 2 to diverge and re-converge at multiple points as it continued to flow south through thick wetland flora. According to a review of the National Wetlands Inventory maps by Alex Rosenberg, the flow path flows through wetlands as defined by the inventory. All flows then converge at the eastern edge of the railroad tracks before passing through a culvert to then reach the man-made settling pond.

According to Michael Martunas the wetland area to the east of the railroad tracks, that the stormwater and truck wash water from the facility flows through, was the unintentional result of construction activities on the railroad spur that leads from the main tracks to the south, to the Facility. According to him, over time a build up of material from the tracks impeded the stormwater flow through the culvert resulting in the area becoming inundated.

Down-gradient of the railroad tracks the flow continues to an area adjacent to the Man-Made Setting pond. This area receives stormwater from Quarry #1 water during periods of dewatering, truck wash water and depending on the hydraulic conditions, stormwater from Quarry #5. The three sources then flow through a culvert to the Man-Made Settling Pond and ultimately to Outfall #104.

13) Man-Made Settling Pond.

Influent to the settling pond is stormwater from the entire Facility as well as truck washing water and NCCW mixed with Quarry #1 stormwater dewatering. The flows are joined in a marshy area just south of the closed CKD pile. Flow is then passed through a culvert underneath the access

road that acts as the eastern most berm for the settling pond. The Settling pond is approximately 1-2 acres in dimension. According to Michael Martunas the facility has never cleaned it out. There is vegetation growing both within the pond and on its shores.

An access road is present along the southern berm. This road leads to the settling pond's outlet and monitoring point for the sampling of discharges from this pond. This discharge point again is approximately one half-mile northeast of the stormwater outfall #104 that according to Michael Martunas and Ray DeGrass is representative of the Pond's water for reasons of stormwater sampling under their MEDEP industrial stormwater permit. The pond discharges into an expanse of wet-land and passes through a culvert underneath the main East-West Railroad tracks before reaching outfall #104.